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IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY

IN RE: : CHAPTER 13  
Carlos J Bautista-Escobar. : CASE NO. 22-20064  
Debtor : HONORABLE JOHN K. SHERWOOD

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**ATTORNEY'S RESPONSE TO CHAPTER 13 TRUSTEE'S MOTION TO DISMISS**

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I, Russell L. Low, Esq. hereby certify the following:

1. The Chapter 13 Trustee, Marie-Ann Greenberg filed a Motion to Dismiss on February 28, 2024, due to failure to provide an update on the personal injury claim.
2. As of today, March 21, 2024, I have been unable to reach the debtor to file a timely opposition. However, we were advised by the debtor's personal injury attorney that the debtor has retained new counsel for the matter.
3. Therefore, I am respectfully requesting the opportunity to reach the debtor before the hearing date and hopefully resolve this matter.

I hereby certify that the foregoing statements made by me are true and correct to the best of my knowledge.

Date: March 21, 2024

/s/ Russell L. Low  
**Russell L. Low**  
Attorney for Debtor